

Exhibit 11

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

LISA TORREY, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
INFECTIOUS DISEASES SOCIETY OF)	
AMERICA, et al.,)	
)	
Defendants.)	
)	

Civil Action No.
5:17-cv-00190-RWS

DECLARATION OF LEONARD H. SIGAL, M.D.

I, Leonard H. Sigal, M.D., do hereby declare as follows:

1. I currently reside in Stockbridge, Massachusetts.
2. I obtained my S.B. from the Massachusetts Institute of Technology in 1972. I obtained my medical degree (M.D.) from Stanford University School of Medicine in 1976.
3. From 1976 to 1979, I worked as an intern and resident in internal medicine at Mt. Sinai Medical Center, in New York, New York.
4. From 1979 to 1981, I worked as an internist, employed by the Westchester Community Health Plan, in White Plains, New York.
5. From 1981 to 1984, I worked as a fellow in rheumatology and clinical immunology at Yale School of Medicine in New Haven, Connecticut.
6. From 1984 to 1988, I served as a faculty member of what is now the State University of New York Upstate Medical University in Syracuse, New York, and Director of the Rheumatology Service at the Syracuse Veterans' Administration Medical Center.
7. From 1998 to 2015, I held faculty positions at the Robert Wood Johnson Medical School in New Brunswick, New Jersey; I was a full-time member of the faculty of the Departments of Medicine and Pediatrics and an adjunct member of the faculty of the Department of Molecular Genetics and Microbiology from 1988 to 2003. From 2003 to 2015, I was a volunteer member of the faculty, serving as a Clinical Professor in the Department of Medicine.
8. From 2003 to 2009, I worked as a Medical Director for Bristol-Myers Squibb, Inc., at the Lawrenceville, N.J., offices.

9. From 2009 to 2010, I worked as a Vice President at Novo Nordisk, in Princeton, N.J.
10. From 2011 to 2017, I worked as a Vice President in the Global Therapeutic Area Leadership group (initially called “The Expert Office”) for PAREXEL International Corporation.
11. In 2010, I founded a consulting company, Gateway Immunosciences, LLC, which provides immunology and rheumatology consulting to pharmaceutical and biotech companies. I work as an independent consultant for Gateway. Gateway’s clients are investment and biotechnology firms, many of which are located in New York City or the Boston suburbs.
12. I am a Diplomate of the National Board of Medical Examiners (1977) and am board-certified in Internal Medicine (1979) and Rheumatology (1984). I have served as a member of the editorial boards of more than a dozen medical journals and have more than 300 publications (the majority in peer-reviewed journals), most of which are related to Lyme disease. I have been recognized with many teaching, mentoring, and clinical honors.
13. I am a Fellow of the American College of Physicians and of the American College of Rheumatology (FACP and FACR, respectively) and was recently elected a Master of the American College of Rheumatology (MACR).
14. I am familiar with the 2000 IDSA Lyme disease guidelines but did not serve on the author panel for those guidelines or do any work on those guidelines whatsoever.
15. I was not on the author panel for the 2006 IDSA Lyme disease guidelines. I was asked by IDSA, I recall, to review a draft of the 2006 IDSA Lyme disease guidelines and provide my comments on the draft. I believe that my work on Lyme disease and its long-term consequences led to my invitation to review a draft of the 2006 IDSA Lyme disease guidelines. I do not recall making any substantive suggestions regarding the draft Guideline document I reviewed and am not aware of any changes that were made as a result of my comment.
16. In connection with my review of the 2006 IDSA Lyme disease guidelines, I never had any communications with Aetna, Anthem, Blue Cross Blue Shield of Texas, Blue Cross Blue Shield Association, Cigna, Kaiser, or United HealthCare (the “Insurance Defendants”) or any other insurance companies, including health insurance companies, and did not enter into any agreement with any Insurance Defendant or any other health insurance company during, before, or after the time of my review.
17. In the 1990s, I provided opinions related to Lyme disease to certain insurance companies, including health insurance companies. These arrangements were limited and did not provide me with a substantial portion of my income. The bulk of my consultations with insurance companies or other clients were completed when I left the full-time faculty of Robert Wood Johnson Medical School to join Bristol-Myers Squibb in 2003; it is my recollection that after 2003 I did not accept new opportunities but that I did complete work already started.

18. I reviewed my emails, my computer records, and my paper records for payments from the Insurance Defendants for consulting arrangements and from any health insurance company for consulting arrangements and could find no evidence of any such payments. I understand that the Insurance Defendants also searched their records for payments to me for consulting arrangements and found no such payments. I do not recall any payments from any Insurance Defendant or any other health insurance company to me for a consulting arrangement and therefore do not know the details of any such payments, include when the last payment was made, which could have been in the 1990s.
19. My work reviewing the 2006 IDSA Lyme disease guidelines was based on my best independent review of the medical and scientific studies at the time and was not influenced in any way by any Insurance Defendant or any other health insurance company, any clients for whom I had previously consulted, or any other person or entity.

I declare, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Executed on:

2/3/2021

Date

Leonard Sigal

Leonard H. Sigal, M.D.